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RACHEL PERILLO

January 6, 2023

Honorable Colleen McMahon
United States District Judge for
the Southern District of New York
500 Pearl Street
New York, New York 11201

Re: *United States v. Ebisawa*, 22 Cr. 256 (CM)

Dear Judge McMahon,

With consent of the government and on behalf of counsel for all defendants, I write to request a 45-day continuance of the January 17, 2023, status conference in this case. The government produced additional Rule 16 discovery last month, which includes a large amount of responsive data from seized electronic devices. The Government has represented that it expects to produce responsive data from additional electronic devices over the course of the next month. Accordingly, the defendants need additional time to review the discovery that has been and will be produced.

To that end, should the Court grant this request, we ask that the time between January 17, 2023, and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161 (h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial, because it will allow the government and counsel for each defendant to continue discussions regarding a possible disposition in the matter, or in the alternative prepare for trial.

We all thank the court for its time and consideration of this matter.

Respectfully submitted,

/s/David Stern & Sabrina Shroff
Attorneys for Somphop Singhasiri

MEMO ENDORSED

1/10/23

Conference Adj. to
March 7, 2023, at 12:00p.m.
Time excluded through Mar. 7,
in the interest of justice,
to facilitate the review of
discovery, and plea discussions.

Colleen McMahon

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/10/23